

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

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No. 4:23-cr-00346

ANDREW VENEGAS

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE KENNETH M. HOYT:

COMES NOW, Andrew Venegas, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The case is currently scheduled for Pretrial Conference January 29, 2024, and Trial February 5, 2024.
3. Defense is still awaiting discovery.
4. The United State Government is unopposed to this motion.
5. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the sentencing for 90 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

PAUL DOYLE & ASSOCIATES, P.C.

By: /s/ Paul Doyle

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25th day of January 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle

Paul Doyle

Attorney for Andrew Venegas

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 25th day of January 2024, Luis Batarse, Assistant United States Attorney, stating he was unopposed to this motion.

/s/ Trevor Sharon

Trevor Sharon

Attorney for Andrew Venegas